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United States of America

8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 ROBERT ALLEN POOLEY,  
15 Defendant.

CASE NO. 2:21-cr-00111-WBS  
UNITED STATES' SUPPLEMENT TO  
RESTITUTION HEARING BRIEF  
DATE: November 12, 2024  
TIME: 10:00 a.m.  
COURT: Hon. William B. Shubb

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17  
18 The United States respectfully submits the following supplement to its restitution brief in order  
19 to also seek restitution for the family of one of Pooley's victims, Carlos Obaid, who is now deceased.  
20 The United States was recently able to make contact with Mr. Obaid's family and find an appropriate  
21 next-of-kin to whom restitution may be made. *See* 18 U.S.C. § 3663A (a)(2) (In the case of a victim who  
22 is ... deceased, the legal guardian of the victim or representative of the victim's estate, another family  
23 member, or any other person appointed as suitable by the court, may assume the victim's rights under  
24 this section).

25 This additional restitution request is submitted on behalf of Carlos Obaid Vitar, who is Mr.  
26 Obaid's father. The basis for the restitution request is as follows: Carlos Obaid also took the  
27 unauthorized Tandem Instructor course that Pooley taught in June or July of 2016. (Exhibit D-1). He  
28 paid Pooley \$1,600 in cash for the course. (*Id.*) His presence at the course was verified by two testifying

1 witnesses at trial: Fabricio Palomino (Exhibit D-2) and Fabian Munoz (Exhibit D-3). Mr. Munoz also  
2 verified that Mr. Obaid has since passed away.

3 In total, Pooley should pay \$1,600 in restitution to Mr. Obaid's father, Carlos Obaid Vitar. This  
4 brings the total restitution requested to \$32,684. An updated summary table is as follows:

	Victim	Fees for Course	Travel	Lost Income	Other Expenses	Total
a.	Palomino	\$1,100	\$234	\$2,400	\$2,400	\$6,134
b.	Munoz	\$2,500	\$1,350	\$20,000		\$23,850
c.	North	\$1,100				\$1,100
d.	Obaid	\$1,600				\$1,600
					Total	\$32,684

10 Dated: November 4, 2024

PHILLIP A. TALBERT  
United States Attorney

11 By: /s/ DHRUV M. SHARMA

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13 Assistant United States Attorney